

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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THE UNITED STATES OF AMERICA FOR THE  
USE OF TRANE US, INC.

Plaintiff,

v.

Case No. 13-cv-02689(NGG)(RER)

JHJ ENTERPRISES, LLC, A LIMITED  
LIABILITY COMPANY; AND WESTCHESTER  
FIRE INSURANCE COMPANY, A  
CORPORATION

Defendants.

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**NOTICE OF MOTION BY PLAINTIFF  
FOR SUMMARY JUDGMENT AGAINST DEFENDANT  
JHJ ENTERPRISES, LLC, A LIMITED LIABILITY COMPANY**

TO: The Honorable Nicholas G. Garaufis  
United States District Court, Eastern District of New York  
United States Courthouse  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Defendants' Counsel**

Berkowitz & Associates, PC  
10000 Lincoln Drive East, Suite 202  
Marlton, NJ 06053

All Parties Registered To Receive Electronic Notification through the CM/ECF System

**PLEASE TAKE NOTICE** that Plaintiff herein moves for an Order pursuant to Rule 56 of  
the Federal Rules of Civil Procedure (the "Rules")

(i) granting and directing the entry of summary judgment for the Plaintiff and against the  
Defendant JHJ Enterprises, LLC, a Limited Liability Company

a) for the unpaid balance of \$31,832.20

b) for interest on the unpaid balance at the rate of nine percent (9%) per annum from March 30, 2012 in the amount of \$5,491.06 through February 29, 2014 or such other amount of interest that may be calculated as of the date of entry of judgment

c) for the costs and disbursements of this Litigation in the sum of \$654.00

d) for attorneys' fees in the sum of \$6,040.84, and

(ii) for such other, further, and different relief as this Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE**, that pursuant to Local Civil Rules 7.1 and 56.1 of the United States District Court Local Rules for the Southern and Eastern Districts of New York, accompanying this Notice, in support of Plaintiff's Motion for Summary Judgment against Defendant JHJ Enterprises, LLC, a Limited Liability Company (the "Motion") are an Affidavit of Wanda Borges dated February 26, 2014 in support of Plaintiff's Motion for Summary Judgment with the exhibits attached thereto, Plaintiff's Statement of Material Facts and Plaintiff's Memorandum of Law in support of this Motion.

**PLEASE TAKE FURTHER NOTICE** that unless a timely objection is made, the Court may grant the Motion and may enter an order.

**PLEASE TAKE FURTHER NOTICE** that a hearing on the Motion may be scheduled and a Notice of the Date of such Hearing will be provided to the parties by the undersigned counsel to the Plaintiff.

Dated: Syosset, New York  
February 26, 2014

By: BORGES & ASSOCIATES, LLC  
Attorneys for The United States of America  
for the Use of Trane US, Inc.  
s/Wanda Borges  
Wanda Borges (wb4904)  
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